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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 KORY ALLEN CROSSMAN,

14 Defendant.

Case No. 2:07-cr-145-KJD-PAL-9

STIPULATION TO EXTEND
DEADLINES IN THIS COURT'S
OCTOBER 6, 2015 ORDER BY
THIRTY (30) DAYS

(Third Request)

15
16 The United States of America, by Assistant United States Attorney Elizabeth Olson
17 White, and Defendant Kory Allen Crossman, by Assistant Federal Public Defender Nisha
18 Brooks-Whittington, submit the following Joint Stipulation to extend, by thirty (30) days, all of
19 the deadlines set in this Court's Order dated October 6, 2015. *See* CR # 1485.

20 The parties agree and stipulate to the following:

21 1. On November 26, 2008, this Court sentenced Defendant to 140 months'
22 imprisonment on his conviction for drug-related offenses. CR # 437.

23 2. On March 23, 2015, undersigned counsel filed a motion for appointment of
24 counsel pursuant to 18 U.S.C. § 3006A and Local Rule 44-1 on behalf of Mr. Crossman to
25 determine whether he may qualify to seek a reduction of his sentence in light of Guidelines
26 Amendment 782 and 18 U.S.C. § 3582(c)(2). CR # 1474.

1 3. On April 8, 2015, this Court issued an Order appointing the Federal Public
2 Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the
3 Probation Office to provide certain documents to the parties within 30 days (i.e., by
4 May 8, 2015) and ordered the Federal Public Defender to file any appropriate motion or
5 stipulation within 120 days (i.e., by August 6, 2015). CR # 1475.

6 4. On August 6, 2015, the parties filed a joint stipulation to extend the deadlines in
7 this Court's April 8, 2015 Order by 60 days. CR 1480. On August 18, 2015, the Court granted
8 the stipulation. CR 1482. The parties filed a second stipulation to extend the deadlines, which
9 was granted on October 6, 2015. CR # 1484, 1485.

10 5. Since the last stipulation was filed, the parties have received Mr. Crossman's
11 disciplinary hearing and progress report records. Defense counsel, however, needs additional
12 time to review those records and file the motion for a sentence reduction.

13 6. For the reason stated above, the parties respectfully request that the Court issue
14 an order extending the deadlines in the Court's October 6, 2015 Order by thirty (30) days.

15 DATED this 18th day of November, 2015.

16 Respectfully submitted,

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18 RENE L. VALLADARES
19 Federal Public Defender

 DANIEL G. BOGDEN
 United States Attorney

20 /s/ Nisha Brooks-Whittington


 /s/ Elizabeth O. White

21 _____
22 NISHA BROOKS-WHITTINGTON
 Assistant Federal Public Defender

 ELIZABETH O. WHITE
 Appellate Chief and
 Assistant United States Attorney

23 DATED: November 19, 2015

 IT IS SO ORDERED

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25 
26 _____
 U.S. DISTRICT JUDGE
 KENT J. DAWSON